

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HARTFORD FIRE INSURANCE CO.
a/s/o Klearwall Industries, Inc.,

Plaintiff,

- against -

MAERSK LINE, a division of the A.P.
Moller-Maersk Group, ALBATRANS INC.,
SAPSAN LLC, and XYZ CORP.,

Defendants.

Case No. 18-cv-00121-PKC

**REPLY DECLARATION OF JUSTIN M. HEILIG
IN SUPPORT OF
SAPSAN'S RULE 12(b) MOTION**

I, Justin M. Heilig, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner at Hill Rivkins LLP, the attorneys for defendant Sapsan LLC in the above-referenced action. I make this Reply Declaration in further support of Sapsan's Rule 12(b) motion to dismiss the claims asserted against it by Plaintiff Hartford Fire Insurance Co, as well as the crossclaims asserted against it by Defendant Maersk Line.
2. On February 4, 2019, Hartford served Sapsan with an amended notice to take the deposition of Yulian Nilsen, Sapsan's owner/managing member and sole employee. The deposition notice also enumerated twelve requests for the production of documents. A copy of the deposition notice is attached hereto as **Exhibit C**.
3. Sapsan served written responses to Hartford's document requests on February 15, 2019, and made a production of responsive documents totaling 946 pages. A copy of Sapsan's written responses is attached hereto as **Exhibit D**.

4. Sapsan's document production (Bates nos. SAP 000001 – 000946) consisted mainly of email correspondence with Defendant Albatrans Inc. and the various attachments thereto, including delivery orders and invoices, for other shipments that Sapsan transported by motor carriage in 2017 and 2018. Attached hereto as **Exhibits E, F, and G**, respectively, are examples of documents relating to shipments that Sapsan transported from container terminals in New Jersey to destinations in Connecticut, New Jersey, and Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 22, 2019



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